

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
JOHN P. "JACK" FLYNN	:	
LESLIE A. FLYNN	:	
	:	
Plaintiffs,	:	
	:	
v.	:	<u>Case 1:21-cv-02587-GHW</u>
	:	
	:	
CABLE NEWS NETWORK, INC.	:	
	:	
Defendant.	:	
-----X		

**AFFIDAVIT OF STEVEN S. BISS, ESQUIRE**  
**IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Civil Rule 1.3 and Title 28 U.S.C. § 1746, I, Steven S. Biss, Esquire, declare under penalty of perjury as follows:

1. My name is Steven Scott Biss.
2. My office address and telephone number is:

300 West Main Street, Suite 102  
Charlottesville, Virginia 22903  
(804) 501-8272

3. I am admitted to the Bar of the Commonwealth of Virginia. I am a member in good standing of the following Courts: the Virginia Supreme Court, the United States District Court for the Eastern District of Virginia, the United States District Court for the Western District of Virginia, the United States Bankruptcy Court for the Eastern District of Virginia, the United States Bankruptcy Court for the Western District of Virginia, and the United States Courts of Appeal for the 4<sup>th</sup> Circuit and 8<sup>th</sup> Circuit.

4. I am currently in good standing with all states, courts and bars in which I am admitted.

5. I have never been convicted of a felony. I have never been disbarred or denied admission or readmission by any court. I have been disciplined by the Virginia State Bar. An explanation of the circumstances and details is attached.

6. There are no disciplinary proceedings pending against me in any court or state bar.

In accordance with 28 U.S.C. § 1746, I declare, certify, verify, and state under penalty of perjury that the foregoing is true and correct.

Executed in Charlottesville, Virginia, on May 12, 2021.



/s/ Steven S. Biss

STEVEN S. BISS, ESQUIRE

Virginia State Bar No. 32972

300 West Main Street, Suite 102

Charlottesville, Virginia 22903

Telephone: (804) 501-8272

Facsimile: (202) 318-4098

Email: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)

COMMONWEALTH of Virginia:

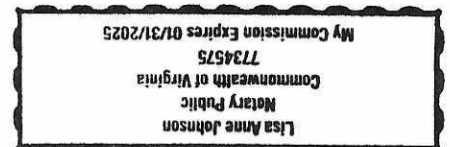
COUNTY/CITY OF Charlottesville

On this 12<sup>th</sup> day of May, 2021, before me, the undersigned Notary Public, personally appeared Steven S. Biss, who swore to and acknowledged the above Affidavit, and on oath stated that he did sign the foregoing freely and voluntarily.

My commission expires: 1-31-2025



Notary Public



Attachment to Motion for Admission Pro Hac Vice:

I am a Counsel for John P. “Jack” Flynn and Leslie A. Flynn in this matter.

I am a member in good standing of the Virginia State Bar.

I am admitted to practice before the Virginia Supreme Court and all Circuit Courts in the Commonwealth of Virginia, the United States District Court for the Eastern District of Virginia, the United States District Court for the Western District of Virginia, the United States Bankruptcy Court for the Eastern District of Virginia, the United States Bankruptcy Court for the Western District of Virginia, and the United States Court of Appeals for the Fourth Circuit and Eighth Circuit. I have also made numerous appearances in Courts across the country on a pro hac vice basis. I have never been denied admission to any court.

I graduated from Princeton University in 1987 with Honors and numerous academic Awards.

I am a sole practitioner with an office in Charlottesville, Virginia.

I am an experienced trial lawyer, with a national practice focused on complex business tort litigation. Over the course of my 29-year career, I have successfully litigated to verdict/judgment hundreds of cases involving claims of defamation, false light, malicious prosecution, conspiracy, fraud, tortious interference with contract, and similar legal issues.

In 2009, I was temporarily suspended from the practice of law in Virginia. I vouched for the representations of a client, whom I did not know well, and the representations turned out to be inaccurate. I acknowledged my error and accepted a suspension. In 2009, while my license was suspended, I assisted a client with an insurance claim, which I learned I was not permitted to do. My license was fully restored in 2010, and it has been active and in good standing in all jurisdictions since.

In 2010, I agreed to a public reprimand in order to resolve a disputed allegation of a conflict of interest made by an opposing party against whom my client had obtained a \$1,100,000 jury verdict.

On March 31, 2021, in *Harvey v. CNN*, Case 1:20-cv-3068 (D. Md.), the District Court granted Plaintiff leave to file an amended complaint. The Court later ruled that the filing of the amended complaint unreasonably multiplied the proceedings in the case, and ordered Plaintiff and his counsel to pay fees to the defendant. The matter is being appealed to the United States Court of Appeals for the Fourth Circuit.